

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

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JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY EKW, DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

NASIR AHMAD TAWHEDI,
a/k/a Nasir Ahmad Azizi,
a/k/a “@Abu_Omir,”

Defendant.

No.

CR 24-467 JD

Violations: 18 U.S.C. § 2339B
18 U.S.C. § 924(h)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1

(Conspiracy to Provide Material Support or Resources to a
Designated Foreign Terrorist Organization)

From in or about June 2024, through on or about October 7, 2024, in the Western
District of Oklahoma and elsewhere,

----- NASIR AHMAD TAWHEDI,
a/k/a Nasir Ahmad Azizi,
a/k/a “@Abu_Omir,” -----

knowingly and voluntarily conspired with others, both known and unknown to the Grand
Jury, to provide material support and resources, to wit: services; personnel (including
himself); and money, to a foreign terrorist organization, namely the Islamic State of Iraq
and al-Sham (“ISIS”), which at all relevant times was designated by the Secretary of State
as a foreign terrorist organization, knowing that ISIS was a designated terrorist

organization, and that ISIS had engaged in and was engaging in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B.

COUNT 2
**(Attempt to Provide Material Support or Resources to a
Designated Foreign Terrorist Organization)**

From in or about June 2024, through on or about October 7, 2024, in the Western District of Oklahoma and elsewhere,

----- **NASIR AHMAD TAWHEDI,**
a/k/a Nasir Ahmad Azizi,
a/k/a “@Abu_Omir,” -----

knowingly attempted to provide material support and resources, to wit: services; personnel (including himself); and money, to a foreign terrorist organization, namely the Islamic State of Iraq and al-Sham (“ISIS”), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, knowing that ISIS was a designated terrorist organization, and that ISIS had engaged in and was engaging in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B.

COUNT 3
**(Receipt of a Firearm and Ammunition to be Used to
Commit a Felony or a Federal Crime of Terrorism)**

From in or about June 2024, through on or about October 7, 2024, in the Western District of Oklahoma and elsewhere,

----- **NASIR AHMAD TAWHEDI,**
a/k/a Nasir Ahmad Azizi,
a/k/a “@Abu_Omir,” -----

knowingly received, attempted to receive, and knowingly and voluntarily conspired with others, both known and unknown to the Grand Jury, to receive a firearm and ammunition, to wit: two AK-47-style rifles and 500 rounds of ammunition, knowing and having reasonable cause to believe that the firearm and ammunition would be used to commit a felony and a Federal crime of terrorism, specifically attempting to provide and conspiring to provide material support and resources to the Islamic State of Iraq and al-Sham ("ISIS"), a designated foreign terrorist organization.

All in violation of Title 18, United States Code, Section 924(h).

A TRUE BILL:

A handwritten signature in black ink, appearing to be "J. L. R.", written over the text "A TRUE BILL:".

FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER
United States Attorney

A handwritten signature in blue ink, appearing to be "Jessica Perry", written over the names "JESSICA PERRY", "MATT DILLON", and "MARK R. STONEMAN".

JESSICA PERRY
MATT DILLON
MARK R. STONEMAN
Assistant United States Attorneys